

**IN UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

MCAFEE, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:08-CV-160
	§	
WILMER CUTLER PICKERING	§	
HALE AND DORR LLP,	§	
	§	
Defendant.	§	

**PLAINTIFF'S DISCLOSURE OF INTERESTED PARTIES AND DISPUTE OF  
DEFENDANT'S DISCLOSURE**

The plaintiff makes the following disclosure of all persons and entities that are financially interested in the outcome of this litigation:

1. McAfee, Inc., Plaintiff
2. Wilmer Cutler Pickering Hale and Dorr, LLP, Defendant

This is a fraud case. McAfee, Inc., the plaintiff, has sued the defendant law firm for overpayment of millions of dollars in legal bills sent to and paid from Plano, Texas. Prabhat Goyal is not a defendant in this case and it is not alleged by the plaintiff that he has committed any billing fraud. He is not a party to this litigation, nor will he be. This is simply a claim by McAfee, Inc., against the Wilmer Hale law firm for conduct committed in the Eastern District of Texas.

To characterize Prabhat Goyal as having a financial interest in the outcome of this case is incorrect and misleading. No recovery is sought in this litigation from Goyal and Wilmer Hale certainly has no right to collect from him what the plaintiff alleges is fraudulent overbilling of McAfee.

Plaintiff believes that the inclusion of Goyal in Defendant's Disclosure is a not-so-subtle attempt to bolster the defendant's argument that this Court lacks jurisdiction and/or that the Court should transfer venue based upon Goyal's contrived inclusion in this case. Again, this matter is simply a suit for fraud for legal bills sent from the defendant to the plaintiff in Plano, Texas and paid from Plano, Texas. Prabhat Goyal has no financial interest in the outcome of this litigation.

Dated: July 2, 2008

Respectfully submitted,

\_\_\_\_/s/Joe Kendall\_\_\_\_\_  
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Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2008, a true copy of this motion was filed and served electronically on all counsel of record via the Court's CM/ECF system.

\_\_\_\_/s/Joe Kendall\_\_\_\_\_  
JOE KENDALL